

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOHN HANCOCK, on behalf of himself and  
other persons similarly situated,

Plaintiff,

v.

AAA GALVANIZING - PEORIA, INC. and  
AZZ INC.,

Defendants.

Case No.: 1:21-cv-4890

Hon. Judge Charles P. Kocoras

**DEFENDANTS' COUNTER MOTION  
TO ENFORCE THE SETTLEMENT AGREEMENT**

Defendants AAA Galvanizing – Peoria, Inc. d/b/a AZZ Galvanizing – Peoria and AZZ Inc. (collectively "Defendants"), by and through their undersigned counsel, respectfully move this Court to enforce the June 21, 2022 settlement agreement entered into by Defendants and Plaintiff wherein Defendants agreed to pay \$531 for each of the 182 settlement class members who signed a waiver of claims and \$950 for each of the 474 settlement class members who did not sign a waiver of claims, equal to a total settlement sum of \$546,942.00.

For the reasons set forth in Defendants' Response in Opposition to Plaintiff's Motion to Enforce Settlement and Counter Motion to Enforce the Settlement Agreement, filed herewith, this Court should grant Defendants' counter motion.

*Signature block on following page.*

Dated: October 21, 2022

Respectfully submitted,

AAA Galvanizing – Peoria, Inc. d/b/a AZZ  
Galvanizing – Peoria and AZZ Inc.

By: /s/ William F. Dugan

William F. Dugan

One of Defendants' Attorneys

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 21, 2022, the foregoing Defendants' Counter Motion to Enforce the Settlement Agreement was filed with the Court via ECF filing, and served via electronic mail on the following:

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By: /s/ William F. Dugan  
William F. Dugan